

Kannaki Radhakrishnan Palani Karupaiyan Vs Elizabeth PUGLIESE Marco Lopez Jiminez Leonel Lopez Daisy Lopez	IN THE UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY NEWARK DIVISION Docket # [DEMAND FOR JURY TRIAL]
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COMPLAINT

Plaintiff Kannaki Radhakrishna and Palani Karupaiyan alleges as follows

1. Plaintiff Kannaki Radhakrishnan and Palani Karupaiyan brings this action for declaratory and injunctive relief,

Monetary damages and civil penalties, Health damages, robbery, compensatory damages, punitive damages and cost of time and effort pain, expense, and suffering, loss of income, damaging social reputation, emotional suffering/distress more, feature health expense, feature loss of income, damage to best interest of family, tort, civil, compensatory damages and few more against

- 1) Elizabeth **PUGLIESE**
- 2) **Marco Lopez**
- 3) Jiminez Leonel Lopez
- 4) Daisy Lopez

Under

Fair Housing Act (FHA)-Title VIII of the Civil Rights Act of 1968,

Fair Housing Amendments Act (FHAA),

28 U.S. Code § 1332 (diversity)

28 U.S. Code § 1343 (1982)

42 U.S. Code § 1988, 42 U.S.C. §§ 1981-1995

Civil Rights Act of 1866

Civil Rights Act of 1991 (Section 1981,1982)

New Jersey Civil Rights Act,(10:6-1 and -2) /New jersey Civil rights.

New Jersey Tort Claims Act

NJ Law against Discrimination (LAD),

NJ vandalism Statute

NJ Property Damage Statute,

NJ Domestic violence act

These above said **laws/acts/rules are called as Plaintiff(s) claimed laws here after.**

The Defendant(s) had did multiple wrong doings and discriminated on the basis of disability by Race, color, National origin, Health Injury, Economic loss, Robbery, less well treatment against other white tenants, Retaliation,. Under these discriminatory actions and wrong doing, the defendant landlord/co-landlord have continuously discriminated and did wrong doing against the defendant for years.

II. JURISDICTION AND VENUE

2. This Court has jurisdiction over this action and may grant the relief sought herein

3. Venue is proper. Additional prayer plaintiff(s) is/were diabetic and suffering from kidney illness and heart attack so plaintiff pray this venue because of it is more easily accessible due to disability.

III. DEFENDANT and Plaintiff (Parties)

4. Elizabeth PUGLIESE (Elizabeth) is landlord and/or co-landlord the the 75 wood ave, Edison NJ 08820. PUGLIESE is middle age(30+) white women, speaks English, Spanish. 75 wood ave is not Elizabeth's Primary residing address and her primary residing address is unknown and refused to give when we wanted to send the keys to her.
5. Marco Lopez is co-landlord, of 75 wood ave, Edison NJ. 08820. Also resided in 75 wood ave, Edison nj. Marco is undocumented/illegal immigrant worker from Mexico and speak Spanish. As well speaks in English. He is 25+yrs old. Very strong body build and white skin.

As Marco said that he live in 75 wood ave for close to 10 yes and works Sankalp restaurant at 1734 Oak Tree Rd Ste 4, Edison, NJ 08820
6. Daisy Lopez resided as tenant in 75 wood ave, Edison nj. Daisy is undocumented/illegal immigrant worker from Mexico and speak Spanish. As well speaks in English. She is 20+yrs old. Very strong body build and white skin.

As Marco said that she live in 75 wood ave for close to 10 yes and works Sankalp restaurant at 1734 Oak Tree Rd Ste 4, Edison, NJ 08820
7. Jiminez Leonel Lopez resided as tenant in 75 wood ave, Edison NJ. Jiminez is undocumented/illegal immigrant worker from Mexico and speak Spanish. As well

speaks in English. He is 20+yrs old. Very strong body build and white skin. As he said he works at 149 Wood Ave, Edison, NJ 08820 , the restaurants in Edison NJ.

8. Marco, Daisy and Jiminez were sibling /brothers and sister. Marco is the eldest.
9. Phone number of the defendants as below

Elizabeth PUGLIESE	<u>732 476 8359</u>
Marco Lopez	<u>732) 915-4932</u>
Jiminez Leonel Lopez	<u>(732) 372-1354</u>
Daisy Lopez	<u>732) 915-4932</u>

10. The exact /correct spelling of the defendant(s)'s names were not known to the plaintiffs yet. These are the name they gave/said to the plaintiffs. When the plaintiff would know the defendants, the plaintiffs should change the name/correct spelling of the defendants and caption of the case. For this matter, plaintiff prays this court for the permission.
11. After Dec 15 2019, Marco Lopez, Jiminez Lopez, Daisy Lopez were moved out of 75 wood ave Edison NJ and they refused to give the new address when I want send the 75 wood ave's key to them.

===== plaintiffs =====

12. Plaintiff Kannaki Radhakrishnan (kannaki) is black skin, ~65yrs old women. Suffering from diabetic, aged women illness. She is Indian national and visited to USA for helping her brother Palani Karupaiyan(plaintiff) and his kids. Hindu

religion, Tamil is mother language and can speaking.. Other than speaking Tamil, can not read or write in Tamil. On any other language can not read, write ,speak including English which is equal to hearing impaired, visual impaired, writing impaired disability in literacy matter.

13. Since Kannaki's disabled person, Plaintiff Palani Karupaiyan prays this court for appoint Palani Karupaiyan as ad litem/guarding to Kannaki.
14. Plaintiff Palani Karupaiyan ("Palani") is naturalized US citizen from India, dark skin, Hindu religion, Tamil language speaking, Plaintiff is 49 yrs old computer engineer. Unemployed now. Plaintiff is born with **situs inversus totalis** and suffering from type ii diabetic, kidney bleeding, and multiple heart attack. Studied Tamil medium school and English is not spoken in the family and English is not proficient language to Palani.

IV. FACTUAL ALLEGATIONS

15. The rental property 75 wood ave. Edison Nj 08820, ("75wood") had two floor with furnished basement.
In the ground floor had 3 room with living room, kitchen and bathroom. The second floor(top) have 3 room set (with kitchen and bathroom). The basement have 3 rooms.
16. In the 2nd floor of 75wood ave, 3 white people were living.
17. Basement 3 rooms are little occupied by the home construction woods.
18. Ground floor's room#1 was occupied by Daisy and her boy-friend, She was living without singeing lease.

Room#2 was occupied by two undocumented illegal immigrant from Mexico who are relative to Marco. They were paying \$325 per month per head and living without living lease.

Room#3 was occupied by Pakistani who was Marco's friend who was paying \$350/month and living without signing lease.

Marco, his brother, his father were sleeping in the living room without signing lease.

19. Around the 6th Nov 2019, Kannaki wanted to place to live for 6months. When we approached Marco for place, he said that he is co-landlord in 75 wood ave and Kannaki could living in 75wood ave without signing lease for six months by paying \$700/months and occupy complete one room(Room#3). Marco should tell the Pakistani to moveout of Room#3. Marco agreed that Palani should/allowed to come and help the disabled Kannaki for her needs. By taking Pakistani out and giving opportunity to Kannaki \$350/month more rent was collected.
20. As Marco said, Marco collected \$350/month per head as rent and kept 20% him and 80% to Elizabeth.
21. One occasion, Marco said that Elizabeth hold his money \$1800 and he did not sign lease.
22. 3rd week of Nov 2019, Marco father foot was leaking flood by diabetic illness, Daisy took my anti-biotic ointment and dress her father foot. Also took our exercise bike for reducing diabetic.
23. On 3rd week of Nov 2019, Marco dropped his iphone on water so he wanted to buy a iPhone from Perth Amboy from Spanish speaking seller so he requested me for ride in my car. I told him that I can arrange new phone number immediately. He replied me that 1) he wanted to retain the old number because he wanted to be connected with attorney

who filed work place injury. 2) must want buy iPhone from Spanish speaking so I gave him ride two way to Perth Amboy.

24. Jiminez Lopez is regular beer alcoholic drinker. Non-working days he drinks 12 to 15 bottle of beer and put his head down, walks and punch the wall with beer bottle to make the holes. Sometime coach roaches comes out of wall-holes. Always talks bad mouth language.

25. Nov 14 2019, Marco told us to pay the electric, gas, water bill. Exhibit (a1, a2,a3).

Plaintiffs pray this court for order the defendant(s) to pay back.

26. 2nd week of Nov 2019, after noon, after grocery we parked the car at 75 wood ave, a middle age white women herself introduced that she is owner of the house and her name is Elizabeth and she wanted to rent this home to her white relative and wanted us to move out. Then we requested her that we wanted 1 month to find another place to live which agreed to give a month.

27. On Dec 01 2019, Marco told us that we should move out immediately. We paid \$700 check in the name of Elizabeth PUGLIESE and we said we should have 1 month notice to move out because of disabilities of the plaintiff. If Marco wanted to move us immediately, we told that our grievance should be heard in the landlord court. Marco took the check. When we told Marco that our grievance need to be heard in landlord court, he replied that landlord court is bullsh!t because he is Mexican and he should murder anyone against him,

28. On Dec 02 2019, after noon, we talked with Elizabeth on her phone 732-476-8359, and told her that Marco wanted to move us immediately and we wanted one month notice to find another place and because of plaintiff is suffering from disabilities. When we told

Elizabeth that our grievance need to be heard in the landlord-tenant court, Elizabeth replied that those courts are bullsh!t and her relative is working in police. We requested her that we can rent the 3rd room but she replied that She wanted to rent only to white people so she is renting to her relative and The white tenant on the 2nd floor does not like non-white people in the 1st floor. Even she should kept the 75 wood ave blank but she should not rent to black Indian people when requested her for renting 75 wood ave to the plaintiffs. Elizabeth told us that If we do not move out immediately, we should use mafia to beat and kill the black indian peoples and remove from the rented home and the mafias would disappear.

29. On Dec 02 2019, from 75 wood ave, Marco and his sibling called Elizabeth over the phone with speaker phone, Elizabeth ordered Marco and his sibling to beat and throw out of house. **Elizabeth yelled over the speaker phone that kick and throw the sick black Indians out of home.** Marco and his sibling hold plaintiff Kannaki and forcefully dragged her out of home. When Plaintiff Palani objected the dragging of Kannaki, Marco pushed the plaintiff in the living room and Plaintiff palani fell and finger nail broken and blood come out. Because of Kannaki was dragged she got hip pain. Marco told that never should come back. Elizabeth told that she historically thrashed the tenant's things in the past. Behind the 75 wood ave, there is stream running which were filled with trash.
30. Dec 2, Dec 3 2019 were whole days and nights snowed and extreme dangerous weather,, we sleep in the car. Sometime car did not re-start to heat up. Due to snow and diabetic, Kannaki is suffering from leg and arm pain. Palani's toes and fingers got numbed. Since Dec 2 2019, we sleep in the car and keep on suffering.

31. On Dec 14 2019, Marco texted that he put our things partially outside of home and covered with old construction material when I'm out of town. Exhibit(B)
32. On Dec 15 2019, Marco texted that whole night and day was raining, Marco opened the cover and thrashed the expensive things in rain damage. Exhibit(c). Because plaintiff told that landlord court should hear the plaintiff grievance, Marco thrashed the plaintiff's expensive things and stole/rob the plaintiff things.
33. On Dec 15 2018, when we texted to Elizabeth, then she replied that she talked to police and police told her to thrash. Exhibit (d). Because plaintiff told that landlord court should hear the plaintiff grievance, Elizabeth told Marco thrashed the plaintiff's expensive things and stole/rob the plaintiff things.
34. Also plaintiff attached completed texting conversation of Marco. Exhibit ().
35. Plaintiffs asked the landlord/co-landlord Marco and Elizabeth for the address to send the keys which they refused to give. Plaintiffs prays this court for plaintiff to communicate with the defendants at 75 wood ave, Edison NJ 08810, until they give the reasonable address to communicate.
36. Plaintiff Kannaki pray this court for order to accessing 75 wood ave and continues to live in 75 wood ave Edison NJ until the case is settled and collect rent from 1st floor tenants.
37. Until now, plaintiff did not have proper address, so plaintiff pray this court for permission to reach the plaintiff at palanikay@gmail.com and the defendant to reach at palanikay@gmail.com
38. Plaintiffs expensive things including personal Computers and its parts, business servers and parts, business electronics, expensive cameras and lens, safe vault including Kannaki's identity documents, silver plate-set belongs to 2-kids and gold jewels, un-

reproducible property document,. Immigrations papers, expensive kids electronics, playstation 4, playstation 3, and xbox and house hold electric,electronic including tv and it accessories part, car parts.

39. Plaintiffs are having very serious financial difficulties and pray for forma pauper on this case.

40. Plaintiff(s) had two bedroom set of things in 75 wood ave apt which belong to family with 2 kids.

41. Without exercise bike, plaintiff palani Karupaiyan is not able to control the diabetic illness

V. CLAIMS FOR RELIEF

Count-1 Violation of Discrimination of Race/ Color/Ethnic

42. The foregoing paragraphs are realleged and incorporated by reference herein

43. The Defendants' conduct/action/Wrongdoing as alleged at length herein

constitutes discrimination based on race/color/ethnic in violation of Plaintiff(s) claimed laws

Count-2 Violation of Discrimination of Country of origin

44. The foregoing paragraphs are realleged and incorporated by reference herein

45. The Defendants' conduct/action/Wrongdoing as alleged at length herein

constitutes discrimination based on Country of origin in violation of Plaintiff(s) claimed laws

Count-3 Violation of Discrimination of Disability

46. The foregoing paragraphs are realleged and incorporated by reference herein

47. The Defendants' conduct/action/Wrongdoing as alleged at length herein constitutes discrimination based on Disability in violation of Plaintiff(s) claimed laws

Count-4 Violation of damaging Health/assault/Injuring the plaintiffs

48. The foregoing paragraphs are realleged and incorporated by reference herein

49. The Defendants' conduct/action/Wrongdoing as alleged at length herein constitutes discrimination/injury/damages/wrongdoings based on damaging Health. Injuring the plaintiff in violation of Plaintiff(s) claimed laws

Count-5 Violation of robbery/damaging/stealing property.

50. The foregoing paragraphs are realleged and incorporated by reference herein

51. The Defendants' conduct/action/Wrongdoing as alleged at length herein constitutes discrimination/injury/damages/wrongdoings based on robbery/damaging/stealing personal property in violation of Plaintiff(s) claimed laws

Count-6 Violation of vandalism.

52. The foregoing paragraphs are realleged and incorporated by reference herein

53. The Defendants' conduct/action/Wrongdoing as alleged at length herein constitutes discrimination/injury/damages/wrongdoings based on vandalism personal property in violation of Plaintiff(s) claimed laws

Count-7 Violation of unfair renting practice

54. The foregoing paragraphs are realleged and incorporated by reference herein

55. The Defendants' conduct/action/Wrongdoing as alleged at length herein constitutes discrimination/injury/damages/wrongdoings based on unfair renting practice in violation of Plaintiff(s) claimed laws

Count-8 Violation of retaliation.

56. The foregoing paragraphs are realleged and incorporated by reference herein

57. The Defendants' conduct/action/Wrongdoing as alleged at length herein constitutes discrimination/injury/damages/wrongdoings based on retaliation in violation of Plaintiff(s) claimed laws.

Count-9 Violation of emotional distress/suffering.

58. The foregoing paragraphs are realleged and incorporated by reference herein

59. The Defendants' conduct/action/Wrongdoing as alleged at length herein constitutes discrimination/injury/damages/wrongdoings based on **emotional distress/suffering** in violation of Plaintiff(s) claimed laws.

WHEREFORE, the Plaintiff Kannaki Radhakrishnan and Palani Karupaiyan prays that the Court enter an ORDER and/or Permanent injunction:

- a. Declaring that the Defendant's actions/wrong doings violate the **Plaintiff(s) claimed laws.** and its implementing regulations;
- b. An order or Declaring that the Defendant's and/or any and all defendants actions violate the discrimination in the **Plaintiff(s) claimed laws**

and its implementing regulations;

- c. Plaintiffs prays this court to recover 1 million dollar from Marco's work place injury case to the plaintiffs for the wrong doings Marco did against the plaintiffs. For Marco's work injury he expect justice from Court when the plaintiff requested him that grievance need to be heard by landlord court, Marco call it bullsh!t because he is Mexican and do not afraid of court.
- d. Plaintiffs pray this court for following order until this case is settled.
 - i) an restrain order against the all defendants
 - ii) Recover the left over plaintiffs personal belongings from 75 wood ave, Edison, NJ
 - iii) Continues access to and continue living on 75 wood ave, Edison NJ 08820 until this case is settled.
 - iv) Continues collect the rent from the tenants living in 2nd floor at 75 wood ave, Edison NJ 08820 until this case is settled.
- e. Order the each defendants to pay the each plaintiff in \$50 million dollar for Each count of discriminations and/wrong doings by defendants.
- f. Order the defendant to pay \$100,000 for the injuries/pain and suffering to each plaintiff.
- g. Plaintiff pray this court for order that the defendants pay-back upto \$1000 the utility bills plaintiff(s) paid.
- h. Order the each defendant to pay \$100,000 to each plaintiff for the plaintiffs' things thrashed/damaged.

- i. Order the each defendant to pay \$100,000 to each plaintiff the plaintiffs' things stolen/robbed.
- j. Plaintiff pray this court for an order to jail upto 5 yrs the each defendant for robbery, vandalism, assault/ injury the plaintiff and plaintiffs' things.
- k. Plaintiff(s) pray this court for order that for arrange mediation program.
- l. Plaintiffs pray this court for order that to help the plaintiff to go inside 75 wood ave and find out what are the list of item stolen and file police complaint and jail the plaintiffs and recover the plaintiffs identity information, India property document.
- m. The Plaintiff(s) consultant an attorney who said that his attorney fee is \$1200.00 per hour and 10 hrs of effort he should complete the case and wanted \$12,000 down payment. Since plaintiffs were disabled and having financial difficulties, plaintiff pray this court to appoint attorney for this plaintiffs' case and order the defendants to pay the attorney fee.
- n. Plaintiffs are running out of prescription medicine for the disability and the defendants damaged the plaintiffs medicine. Plaintiff need to followup with doctor and get lab test and further medicine. So plaintiff pay this court for emergency order that any and all defendants need to pay \$5000.00 to the plaintiffs.
- o. Plaintiff pray this court for relief that plaintiff should have email subscription for docket entry.

- p. 3 weeks effort plaintiff(s) prepared the complaint, plaintiff(s) pray this court for order the any and all defendant to pay \$10,000 for plaintiffs time, effort and pain in preparing this complaint.

DEMAND FOR JURY TRIAL

Plaintiff Palani Karupaiyan demands a trial by jury of all issues so triable in this action.

Respectfully submitted


Kannaki Radhakrishnan
Ph: 212-470-2048(m)
palanikay@gmail.com

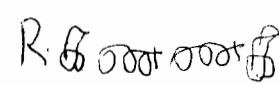

Palani Karupaiyan

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 01/06/2020 

Signature of Plaintiff

Printed Name of Plaintiff Kannki Radhakrishnan

Signature of Plaintiff

Printed Name of Plaintiff Palani Karupaiyan 

